

REMARKS

Reconsideration and allowance of the present application are respectfully requested. Claims 1-61 are currently pending in this application.

An Information Disclosure Statement accompanies this Response. The Examiner is respectfully requested to acknowledge consideration of the documents cited in the Information Disclosure Statement by initialing the attached PTO-1449 form and returning a copy of the initialed form to the undersigned.

Formal Drawings also accompany this Response for consideration by the Patent Office.

This Response makes changes to the specification to address various informalities noted upon review of the application. These changes are reflected in the rewritten paragraphs presented above.

Claim 4 was rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter set forth therein. The formality identified in the Office Action has been addressed in this Response, and the Applicant accordingly requests the Examiner to reconsider and withdraw this rejection.

Claims 1-21 and 23-45 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,191,645 to Carlucci et al. (referred to below as "Carlucci"). Applicant respectfully traverses this rejection for the following reasons.

As amended, independent claim 1 recites a video output system for producing video signals within a video graphics workstation. The video output system comprises a receiver for receiving a video signal forwarded from a video signal source within the video graphics workstation, a video pipeline for post-processing the received video

1 signal, the video pipeline producing a post-processed video signal, and a video output
2 module for converting the post-processed video signal, the video output module
3 producing a formatted video signal.

4 Carlucci does not teach or suggest the above-described recitations of claim 1. A
5 brief description of the Carlucci patent is presented below, followed by an explanation of
6 the exemplary deficiencies of this document vis-à-vis claim 1.

7 Carlucci is directed to a system and method for generating signals from digitized
8 film images (column 1, lines 60-62). With reference to Fig. 1 of Carlucci, the system
9 includes a scanner 10 and a camera processor 12. Film scanner 10 transports motion
10 picture film past camera processor 12, which includes a video camera and related analog
11 video signal processing circuitry. Camera processor 12 images each film frame adjacent
12 to it, and generates an analog signal representing each frame. See column 3, lines 44-60.
13 The analog output of the camera processor is supplied to a film scanning processor 14.
14 Within film scanning processor 14, the analog video signals from camera processor 12
15 are digitized, and various digital signal processing operations are performed on the
16 digitized video. See column 3, lines 61-68. More specifically, as shown in Fig. 2 of
17 Carlucci, the film scanning processor 14 includes input processor 70 (which receives the
18 analog output of camera processor 70), digitized signal processor 72, output processor 74,
19 and control processor 76. Input processor 70 digitizes the analog input signal, performs
20 preliminary corrections on the resulting digitized data, and supplies the preliminary
21 processed digitized data to the digital signal processor 72 for color correction. The color
22 corrected data generated in processor 72 are supplied through output processor 74 to
23 stores 30 and 31. Processors 70, 72, and 74 operate under control of the control
24 processor 76. See column 5, lines 22-35.

1 Carlucci pertains to a markedly different system than the invention recited in
2 claim 1. For instance, Carlucci does not teach or suggest a video output system for
3 producing video signals within a video graphics workstation, where the video output
4 system comprises a receiver for receiving a video signal forwarded from a video signal
5 source within the video graphics workstation, as now recited in claim 1. The Office
6 Action interprets the recited receiver as Carlucci's camera processor 12, the recited video
7 pipeline as Carlucci's film scanning processor 14, and the recited video output module as
8 Carlucci's output processor 74 (the Office Action, page 2, last paragraph). However, this
9 interpretation is misplaced. For instance, Carlucci's camera processor 12 (which is being
10 construed as the recited "receiver") does not receive a video signal forwarded from a
11 video signal source within a video graphics workstation. Rather, film scanner 10
12 transports motion picture film past camera processor 12, and camera processor 12
13 generates an analog signal representing each film frame that is fed past it. Therefore,
14 Carlucci's camera processor is a *source* of video signals, rather than a *recipient* of such
15 video signals.

16 Further, claim 1 recites that the video pipeline produces a post-processed video
17 signal, and that the video output module converts the post-processed video signal into a
18 formatted video signal. As noted above, the Office Action interprets Carlucci's film
19 scanning processor 14 as the recited video pipeline, and Carlucci's output processor 74
20 (shown in Fig. 2) as the recited video output module. However, Carlucci's output
21 processor 74 is actually a component *within* the film scanning processor 14, and
22 therefore, the output of the film scanning processor 14 cannot said to be fed to the output
23 processor 74; rather, the output of the output processor 74 defines the output of the film
24 scanning processor 14 (see Fig. 2 of Carlucci).

1 For at least the above-identified reasons, Carlucci does not teach or suggest the
2 video output system recited in independent claim 1. The remaining rejected independent
3 claims (i.e., claims 23 and 44) recite related subject matter to that recited in claim 1.
4 Therefore, these claims also distinguish over Carlucci for reasons similar to those given
5 above.

6 The remaining claims rejected under 35 U.S.C. § 102(b) (i.e., claims 2-21, 24-43,
7 and 45) depend variously from claims 1, 23, and 44, and are therefore allowable for at
8 least this reason. In addition, these claims recite additional features that are not taught or
9 suggested by Carlucci. For example, claims 6, 7, and 8 (and corresponding method
10 claims 28, 29, and 30) recite that the video signal source (i.e., that forwards the video
11 signal to the receiver of the video output system) is a storage medium for storing data in
12 electrical form, a video graphics processor, and a video signal input system, respectively.
13 In rejecting these claims, the Office Action states that "Carlucci teaches the received
14 video signal is forwarded from video input system and a video graphics processor and a
15 storage medium in figure 1 through block 12" (page 3, fourth full paragraph of the Office
16 Action). However, as explained above, no video signal is fed into Carlucci's camera
17 processor 12; rather, the camera processor 12 generates an analog signal in response to
18 reading motion picture film physically transported by the scanner 10 past the camera
19 processor 12. Certainly, the scanner 10 cannot be construed as a storage medium for
20 storing data in electrical form, a video graphics processor, or a video signal input system
21 of a video graphics workstation.

22 Another example of a dependent claim that is not disclosed or suggested by
23 Carlucci is claim 16. This claim recites that the process of post-processing includes
24 changing the sample rate of the video signal being post-processed. The Office Action
25 states that column 3, lines 54-60 of Carlucci discloses this feature. However, the cited

1 passage of Carlucci describes the rate at which the camera processor 12 scans motion
2 picture film, not a sample rate changing operation that is performed in a video pipeline.

3 For at least the above-stated reasons, the Applicant submits that the 35 U.S.C. §
4 102(b) rejection based on Carlucci is misplaced, and respectfully requests that it be
5 withdraw.

6 Claim 22 was rejected under 35 U.S.C. § 103 as being unpatentable over Carlucci
7 in view of U.S. Patent No. 5,937,173 to Olarig et al. (referred to below as "Olarig").
8 Applicant respectfully traverses this rejection for the following reasons.

9 Claim 22 depends on independent claim 1, and is therefore distinguishable over
10 Carlucci for at least this reason. Olarig also does not disclose the subject matter of
11 independent claim 1 identified above. Therefore, Olarig does not make up for the
12 deficiencies of Carlucci, whether considered alone or in combination with Carlucci. The
13 Applicant therefore respectfully requests that the U.S.C. § 103 rejection based Carlucci
14 and Olarig be withdrawn.

15 In conclusion, the Applicant respectfully requests that the rejections based on 35
16 U.S.C. § 102 and 35 U.S.C. § 103 be withdrawn.

17 A number of additional claims (i.e., claims 46-61) have been added which also
18 distinguish over the applied documents. The new claims include new independent claims
19 52 and 57. These claims recite subject matter that is related to claims 1, 6-8, 23, and 28-
20 30 discussed above, and are therefore distinguishable from the applied art for reasons
21 similar to those given above.

22 A number of dependent claims have been added (i.e., claims 46-51, 55-56, and
23 58-61). These claims variously depend on claims 1, 23, 52, and 57, and are allowable for
24 at least this reason. In addition, these claims recite additional subject matter which is not
25 disclosed or suggested by the applied documents. For instance, dependent claim 46

1 recites that the receiver and the video pipeline (identified in claim 1) are implemented as
2 an integrated video processing module, where the video output module is detachably
3 coupled to the video processing module. Dependent claim 47 recites that the video
4 output module is a daughterboard module that couples to the video processing module.
5 Dependent claim 48 recites that the video output module includes a processor that is
6 configured to inform the video processing module of its configuration. Neither Carlucci
7 nor Olarig, whether considered alone or in combination, teach or disclosure the above-
8 identified features.

9 As a final matter, to clarify the record, the arguments presented above are not
10 exhaustive; Applicant reserves the right to present additional arguments to fortify its
11 position. Further, Applicant reserves the right to challenge the prior art status of one or
12 more documents cited in the Office Action.

13 All objections and rejections raised in the Office Action having been addressed, it
14 is respectfully submitted that the present application is in condition for allowance and
15 such allowance is respectfully solicited. The Examiner is urged to contact the
16 undersigned if any issues remain unresolved by this Amendment.

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18 Respectfully Submitted,

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